

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>V.</b>	)	<b>CASE NO: 3:05-CR-287-TMH</b>
	)	
<b>CORNELIUS DONAL TURNER</b>	)	

**MOTION TO CONTINUE TRIAL**

**COMES NOW** the Defendant, **CORNELIUS DONAL TURNER**, by undersigned counsel, Donnie Bethel, pursuant to 18 U.S.C. 3161 §§ (h)(8)(A) and (h)(8)(B), and respectfully moves this Court for an Order continuing this matter from the June 5th Trial Docket. In support of this motion, the Defendant would show the following:

1. On May 15th this Court adopted the recommendation of Magistrate Judge Vanzetta McPherson and denied Defendant's Motion to Suppress.

2. Now that Defendant's Motion to Suppress has been denied, Defendant is negotiating a plea agreement with the Government. Defendant has already agreed to be debriefed by Government agents as part of this plea agreement, but due to the schedules of Defendant's counsel and the ATF agents who will debrief the Defendant, this proffer cannot be scheduled until the week of June 5, 2006.

3. Therefore, Defendant requests that his trial be continued to allow sufficient time to allow Government agents to debrief the Defendant and to allow Defendant's counsel and counsel for the United States to complete the negotiation of a plea agreement in this case.

4. The United States, through Assistant United States Attorney Kent Brunson, concurs with this Motion to Continue.

**WHEREFORE**, Defendant respectfully requests that this Motion to Continue be granted.

Dated this 22nd day of May 2006.

Respectfully submitted,

s/ Donnie W. Bethel  
DONNIE W. BETHEL  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Kent Brunson, Esquire  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, Alabama 36104

Respectfully submitted,

s/ Donnie W. Bethel  
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